

Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 East 42nd St. Suite 4510
New York, New York 10165

Telephone: (212) 317-1200
Facsimile: (212) 317-1620

October 24, 2019

VIA ECF

Hon. Peggy Kuo
United States Magistrate Judge
United States Courthouse
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Rodriguez v. New York Fast Carting Corp., et al.
18-cv-4072 (PKC) (PK)

Dear Judge Kuo:

I write to respectfully request that the October 28, 2019 discovery deadline be extended to December 2, 2019. The reason for the request is that due to counsel's scheduling conflicts the parties have not been able to take depositions of the parties.

Defendants join the request. This is the fourth request for an extension of the deadline for completion of discovery. The previous requests were granted.

The parties also request that if the extension is granted, the Court grant corresponding extensions of the following dates:

Pre-Motion Conference Request Deadline: From November 27, 2019 to January 15, 2020

Pretrial Order Deadline (if no Motion): From December 30, 2019 to February 10, 2020

A proposed revised discovery plan is submitted herewith.

I thank the Court for its attention to this matter.

Respectfully Submitted,

/s/Joshua S. Androphy
Joshua S. Androphy